



**CITY OF ALTON
ILLINOIS**

OFFICE OF MAYOR
TOM HOECHST

101 E. THIRD ST.
ALTON, IL 62002

October 9, 2009

Dear Matt Wagoner:

In accordance with CFR 44 Ch.1 Part 67, please consider this letter as an appeal by the City of Alton, Illinois, of proposed base flood elevations indicated on the preliminary digital flood insurance rate maps (DFIRMs), maps 17119C0037D, 17119C0041D, 17119C0042D, 17119C0043D, 17119C0044D, 17119C0055D, 17119C0061D, 17119C0062D, 17119C0063D, 17119C0156D, and 17119C0157D. We understand that the basis of an appeal must be technical error in data or methodology and we are providing documentation of our assertions of error along with this letter.

The Southwestern Illinois Flood Prevention District Council recently employed an engineering team to evaluate the preliminary DFIRMs. A copy of their report is enclosed. Our engineering consultants reviewed stream gage data and compared them to values presented in the preliminary Flood Insurance Study (FIS) and DFIRMs. The consultants concluded that:

"There are significant deviations in peak discharge values from the values presented in the FIS compared to the data developed from the individual stream gages. Data at 6 of the 8 gages showed the 100-year peak discharge at the stream location based on the gage data to be up to 140% less than the same discharge value for the same event listed in the FIS. The use of a smaller discharge value than listed in the FIS at the subject locations, as supported by the gage evaluation, would significantly narrow the floodplain and decrease the base flood elevations."

Based on the conclusions of the engineering team we believe that there are systemic problems with the base flood elevations shown on the preliminary DFIRMs. These problems include:

1. Significant contradictions between peak discharge values listed in the preliminary FIS and the values determined from historic records at pertinent stream gages.
2. The use of archaic rainfall data to determine the discharge values listed in the preliminary FIS.
3. The failure to use results of numerous independent detailed engineering studies associated with Letters of Map Change (LOMC), all of which were previously approved by FEMA but were not incorporated into the preliminary DFIRMs.

The enclosed report from our engineering team includes data and analysis to support these conclusions.

The DFIRMs have enormous implications for citizens, businesses, and the local economy. Until the above issues are addressed and we can have confidence in the accuracy and reliability of the DFIRMs, we urge that they not be adopted or finalized by FEMA.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Hoechst", with a long horizontal flourish extending to the right.

Tom Hoechst, Mayor
City of Alton, Illinois

CC: Les Sterman